

C. Daniel Herrin
State Bar No. 24065409
HERRIN LAW, PLLC
4925 Greenville Avenue, Suite 455
Dallas, TX 75206
(469) 607-8551 Phone
(214) 722-0271 Fax
ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

PHILIP STEELE WARREN	§	
	§	CASE NO. 20-40343
	§	
Debtor	§	CHAPTER 13

U.S. Bank Trust National Association, as	§
Trustee of the Igloo Series IV Trust,	§
its successors and/or assignees	§
Movant	§

VS.

PHILIP STEELE WARREN	§
	§
Debtor	§

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, **Philip Steele Warren**, (hereinafter, "Debtor") in the above-styled and numbered cause, and in response to the Motion for Relief from Stay of **U.S. Bank Trust National Association, as Trustee of the Igloo Series IV Trust, its successors and/or assignees**, ("Movant") in regard to the collateral referenced in Movant's motion.

Debtor respectfully shows:

1. The allegations of **Movant** contained in paragraph 1 of the motion are admitted.
2. The allegations of **Movant** contained in paragraph 2 of the motion are admitted.

3. The allegations of **Movant** contained in paragraph 3 of the motion may not be admitted or denied as Debtor is without sufficient knowledge or information to form a belief as to the truth and therefore make a qualified denial.

4. The allegations of **Movant** contained in paragraph 4 of the motion are admitted.

5. The allegations of **Movant** contained in paragraph 5 of the motion are admitted.

6. The allegations of **Movant** contained in paragraph 6 of the motion are denied.

7. The allegations of **Movant** contained in paragraph 7 of the motion are denied.

8. The allegations of **Movant** contained in paragraph 8 of the motion are denied.

9. The allegations of **Movant** contained in paragraph 9 of the motion are denied.

10. The allegations of **Movant** contained in paragraph 10 of the motion are denied.

11. The allegations of **Movant** contained in paragraph 11 of the motion are denied.

12. The allegations of **Movant** contained in paragraph 12 of the motion are denied.

13. The allegations of **Movant** contained in paragraph 13 of the motion are denied.

14. The allegations of **Movant** contained in paragraph 14 of the motion are denied.

15. The allegations of **Movant** contained in paragraph 15 of the motion are denied.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that Movant's Motion For Relief From Automatic Stay be denied and for such other and further relief as the Court may deem just and appropriate.

Dated: June 25, 2020.

Respectfully Submitted,

HERRIN LAW, PLLC

/s/ C. Daniel Herrin
C. Daniel Herrin
State Bar No. 24065409
4925 Greenville, Suite 455
Dallas, TX 75206
214.810.5294 Phone
469.327.2902 Fax
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 26, 2020, a true and correct copy of the foregoing Response to Motion For Relief From Stay was served on the following parties in interest by first class mail or electronic notice:

CHAPTER 13 TRUSTEE

Carey D. Ebert

U.S. TRUSTEE

DEBTOR

Philip Steele Warren
1113 Grassmere Drive
Richardson, TX 75080

OPPOSING COUNSEL

Angie Marth, Esq.
GHIDOTTI BERGER
600 E. John Carpenter Fwy., Ste. 175
Irving, TX 75062

By: /s/ C. Daniel Herrin
C. Daniel Herrin
State Bar No. 24065409